

Thomas K. Coan, OSB #89173

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Attorney for Defendant Santilli

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA, }
Plaintiff, }
vs. }

PETER SANTILLI, }
Defendant. }

Case No. 3:16-cr-00051-BR

**MOTION FOR LEAVE TO FILE
MOTION UNDER SEAL**

Defendant Peter Santilli, through his attorney, Thomas K. Coan, moves the court for an order allowing him to file the enclosed motion *ex parte* and under seal because it contains confidential work product that should not be shared with the government or the other parties in this case.

Dated this 17th day of March 2016.

Thomas K. Coan

Thomas K. Coan, OSB 89173

Attorney for Defendant